

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

Angela Steinhardt,

Plaintiff,

v.

albertAI.click, Lena Doe, and John
Does 1 – 20,

Defendants.

Case No. 1:25-cv-00303-MJT

**Plaintiff's Motion for
Extension of Temporary
Restraining Order**

Plaintiff Angela Steinhardt hereby moves to extend the extant
Temporary Restraining Order under Federal Rule of Civil Procedure 65(b)(2).

I. Background

At Plaintiff's request, the Court entered a Temporary Restraining
Order on June 17, 2025 (the "TRO"). Dkt. 3. The TRO ordered the freezing of
cryptocurrency exchange accounts holding assets traceable to Ms. Steinhardt.
Binance, Ltd. ("Binance") recently implemented this freeze as to several user
accounts. If not extended, the TRO will expire on July 1, 2025.

II. Legal Standard

Under FRCP 65(b)(2), a TRO may be extended by up to 14 days "for
good cause." In crypto-related cases like this one, Courts have granted
extensions of asset-freezing TROs to allow plaintiffs to continue working with

exchanges on implementation and information gathering in preparation for a motion for preliminary injunction, and to allow additional time to serve notice on interested parties in advance of plaintiffs' forthcoming motions for preliminary injunctions.¹

III. Request for Extension

Plaintiff requests that the Court extend the TRO for 14 days to July 15, 2025. This extension would allow Ms. Steinhardt to continue to work with Binance to secure user information for the accounts subject to the TRO and thereby provide notice of Ms. Steinhardt's forthcoming Motion for Preliminary Injunction, which will request that the freeze be extended through trial. Plaintiff respectfully submits that these considerations show good cause for extension of the TRO under FRCP 65, and requests that the Court enter an extension in the form of the Proposed Order submitted along with this Motion.

¹ See, e.g., *Licht v. Ling*, No. 23-cv-01018, *Order Granting 14-Day Extension of Temporary Restraining Order*, pp. 1—2 (N.D. Tex. May 24, 2023) (granting extension of asset-freeze TRO in crypto-fraud case where the alleged victim was “work[ing] diligently with the exchanges to (1) resolve issues related to service and (2) obtain discovery regarding the defendants so they can be given notice of the suit and the TRO”); *Astrove v. Doe*, Case No. 22-cv-80614, *Order Modifying and Extending Temporary Restraining Order*, *passim* (S.D. Fla. May 3, 2022) (same).

Dated: June 30, 2025

Respectfully submitted,

THE HODA LAW FIRM, PLLC

A handwritten signature in black ink, appearing to read "M Hoda", enclosed within a large, open circle.

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